

# *Contractor's Guide to Hazardous Waste Compliance*

# Contractor's Guide to Hazardous Waste Compliance

PSNS&IMF P5090(5) (Rev. 11-03)

Prepared by the Environmental Division, Code 106.3

Reviewed By: Linda L. Boyer  
L. L. BOYER  
Contracts Support Program

11-04-03  
Date

Reviewed By: T. Brorson  
T. J. BRORSON  
Head, Air Pollution/Asbestos/Contracts Branch

01-20-04  
Date

Reviewed By: S. S. Rupp  
S. S. RUPP  
Head, Environmental Division

2/23/04  
Date

Reviewed By: L. A. Cole  
L. A. COLE  
Director, Environment, Safety and Health Office

3/1/04  
Date

ENVIRONMENT, SAFETY AND HEALTH OFFICE



PUGET SOUND NAVAL SHIPYARD AND  
INTERMEDIATE MAINTENANCE FACILITY  
Bremerton, Washington

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ABOUT THIS GUIDE

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The *Contractor's Guide to Hazardous Waste Compliance* at Puget Sound Naval Shipyard and Intermediate Maintenance Facility (PSNS & IMF) and Naval Station (NAVSTA) Bremerton, herein referred to as the Bremerton naval complex (BNC), is designed to meet the information needs of contractors working at the BNC. Puget Sound Naval Shipyard integrated with Intermediate Maintenance Facility Northwest and is now named Puget Sound Naval Shipyard and Intermediate Maintenance Facility (PSNS & IMF). This guide is only applicable to the

Controlled Industrial Area (CIA) of PSNS & IMF and Naval Station Bremerton. This is also a useful tool for other personnel, such as Contracting Officers and design managers, who will very likely find themselves confronted with one or more hazardous waste issues involving contractor-generated waste. Throughout this guide, the term "Contracting Officer" also includes the representatives of the Contracting Officer.

This guide is the second revision to the original one, which was issued in August 1997. This revision was made to replace information regarding a three day classroom course provided by the BNC with a two hour brief. It also adds environmental points of contact for Naval Station Bremerton.

Intended as a "primer" on hazardous waste regulations and BNC policies and procedures, this guide is structured around questions you need answered and issues you need to know about. This guide amplifies station specific procedures to meet the Government's responsibilities under WAC 173-303-330. The contractor is still responsible for training all their personnel on the applicable Washington State, Federal, and BNC specific regulations.

The information provided offers a level of detail needed for basic knowledge of key hazardous waste issues. This knowledge will better enable you to work with your Contracting Officer and the environmental personnel in the BNC, and help you develop and maintain the most efficient and effective Hazardous Waste Program possible while performing your task.

If you have any questions concerning the information provided, do not hesitate to call your Contracting Officer. Telephone numbers for the BNC's designated points of contact are provided in this guide, for Contracting Officers use.

**Disclaimer:** *Each contractor is responsible for compliance with all contractual requirements, including compliance with all applicable Federal, State, and local environmental requirements, as well as BNC environmental requirements as specified in the contract. This document is provided for general awareness only. It remains the contractor's duty to comply with all applicable laws, and this guide alone cannot assure such compliance. To the extent the requirements of this document are in direct conflict with the contract specifications, the contract specifications control. If the contractor believes this guidance conflicts with the contract specifications, the issue should be discussed with the Contracting Officer in order to avoid violating relevant environmental laws.*

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## TELEPHONE LISTING

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### EMERGENCIES (Medical Assistance, Fire, Flooding, Emergency Spill Response, etc.):

When using a BNC telephone .....	911
When using a non-BNC telephone system .....	360-476-2222

### CONTRACTING OFFICES

EFA-NW Bremerton ROICC, Building 467 .....	360-476-8130	
	or 360-476-4552	
EFA-NW Silverdale Field Office .....	360-396-6844	
Supervisor of Shipbuilding (SUPSHIP) .....	360-476-4326	
Fleet and Industrial Supply Center (FISC) .....	360-476-4289	
NAVSTA Bremerton, Contract Oversight (QAE).....	360-476-7947	

### BNC ENVIRONMENTAL POINTS OF CONTACT (For Contracting Officer use):

<u>PROGRAM</u>	<u>PSNS&amp;IMF</u>	<u>NAVSTA BREMERTON</u>
Air (Permits/Discharges/ODS)*	360-476-0124	
Asbestos	360-476-4699	360-476-4744
Contracts Support	360-476-0136	360-476-6691
Hazardous Material*	360-476-4364	
Hazardous Waste (HW)	360-476-5734	360-476-6067
Historical/Natural Resources	360-476-4049	360-476-6691
Installation Restoration	360-476-2630	360-476-6091
PCBs	360-476-0127	360-476-6067
Solid Waste*		360-476-6067
Spill Prevention and Response*	360-476-1842	
Water Quality and Stormwater/Sewer Discharge	360-476-0118	360-476-6614

\*Program is managed for all of the BNC by the activity whose phone number is listed.

### BNC ENVIRONMENTAL SERVICES (For Contracting Officer Use):

Waste Designation** .....	360-476-8612
HW/PCB (Containers/Labels/Turn-In (B-367)** .....	360-476-7777

\*\*Services provided for all of the BNC.

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## INTRODUCTION

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The Chief of Naval Operations (CNO) has defined the Navy's environmental vision to be "*a Navy recognized as an environmental leader while effectively executing naval operations.*" The Navy is committed to operating in a manner compatible with the environment. National Defense and environmental protection are, and must be, compatible goals. An important part of the BNC's mission is to prevent pollution and protect the environment.

To fulfill this vision, you (as a Navy-employed contractor) must provide the personal commitment to develop an environmental protection ethic. Environmental regulations have increased exponentially in recent years. Specific to hazardous waste, the BNC operates as a fully-regulated, large quantity generator. The BNC has implemented unique requirements in the area of accumulation for waste management. Compliance with the hazardous waste regulations and BNC rules requires specialized knowledge or expertise. PSNS & IMF (Code 106.33) and NAVSTA Bremerton (Code N45A4) provide the hazardous waste support for their respective facility. Rather than re-iterating these organizations throughout the guide we have used the phrase "base environmental office".

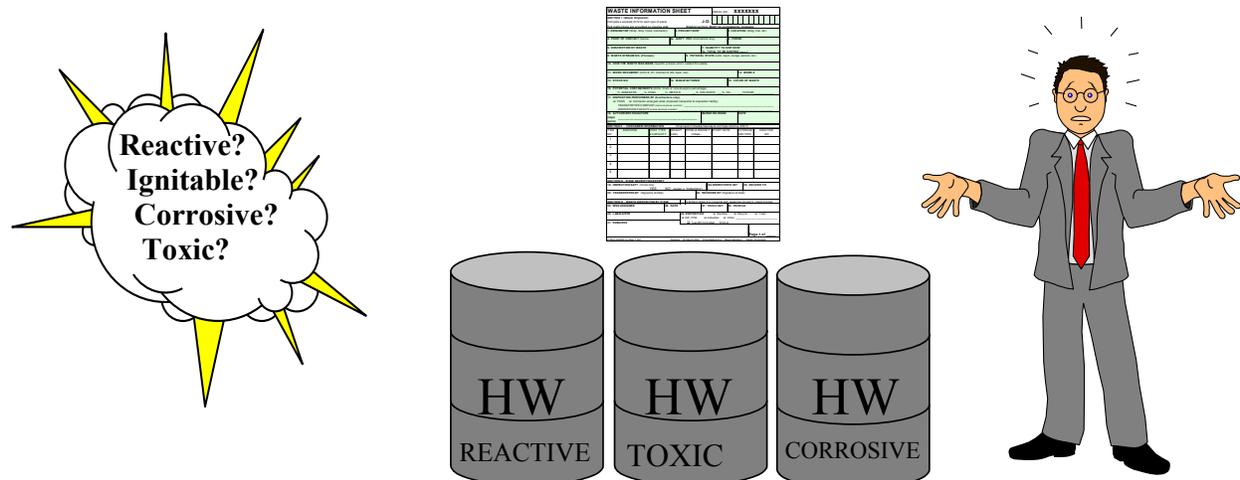
All Navy personnel, including contractors working for the Navy, shall comply with all applicable Federal, State, local, and internal BNC hazardous waste requirements as specified in the contract.

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## WHAT IS HAZARDOUS WASTE AND HOW DO I KNOW IF I HAVE ANY?

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**“Hazardous Waste”** is defined and regulated by the Federal Resource Conservation and Recovery Act (RCRA) and by the Washington State Dangerous Waste Regulations (WAC 173-303). A copy of the WAC may be obtained by contacting the Washington Department of Ecology Records Center at (360) 407-6038. The WAC is also available at website: <http://www.ecy.wa.gov/biblio/wac173303.html>. A waste is considered hazardous if it meets certain levels of reactivity, ignitability, corrosivity, or toxicity, or is otherwise listed as a hazardous waste. The State of Washington regulates more waste as hazardous than mandated by RCRA and uses the term *“dangerous waste.”* The BNC uses the terms *hazardous* and *dangerous* waste synonymously. In general, the regulations address how to identify if a waste is hazardous and the day-to-day management of these wastes for accumulation, containerization, labeling, storage, and disposal.



**Quick Tip: Try to Have Waste Designated BEFORE it's Generated....**

All waste that originates or is generated in the BNC must be identified, designated, and tracked ... **even if the waste is non-hazardous.** Shop 90HM designates all waste generated at the BNC. This is accomplished by the submittal of a Waste Information Sheet (see page 3) through your Contracting Officer. In completing Section 1, Block 1, state the Prime contractor's name. A subcontractor's name, who is actually producing the waste, can be identified following the prime's name. Block 5 is for the phone number of the Prime contractor. If your waste streams are determined before you create them, it eliminates having to control everything as **“Waste Awaiting Designation.”** Once a waste stream is established it is added to the Waste Stream Dictionary. The dictionary is a listing of all designated waste streams for the BNC, including common trash. Contractors will work from their WISs and are not provided the Waste Stream Dictionary.



**Quick Tip: Shop 90HM Designates ALL Waste.**

# WASTE INFORMATION SHEET (WIS)

PSNS 4855/612 (Rev. 4-00) (Front)

**FOR ILLUSTRATION PURPOSES ONLY - DO NOT REPRODUCE**

WASTE INFORMATION SHEET				SERIAL NO. <b>XXXXXXX</b>			
<b>SECTION I (Waste Originator)</b>				<b>J.O.</b>			
Complete a separate WIS for each type of waste.				Shaded sections <b>MUST</b> be completed by originator			
Full instructions are provided on reverse side							
1. ORIGINATOR (Shop, Ship, Code, Contractor) PRIME/SUB-CONTRACTOR		2. PROJECT/SHIP		3. LOCATION (Bldg, Pier, etc)			
4. POINT OF CONTACT (Name)		4a. GOV'T POC (Contractors only)		5. PHONE PRIME			
6. DESCRIPTION OF WASTE				7. QUANTITY TO SHIP NOW: 7a. TOTAL TO BE SHIPPED (approx):			
8. WASTE STREAM NO. (If known)			9. PHYSICAL STATE (solid, liquid, sludge, aerosol, etc)				
10. HOW THE WASTE WAS MADE (Specific process which created this waste)							
11. WORK DOCUMENT (DOC #, IPI, Contract #, MIL Spec, etc)						12. MSDS #	
13. STOCK NO.		14. MANUFACTURER			15. COLOR OF WASTE		
16. POTENTIAL CONTAMINANTS (Either check or include approx percentage) ___% ASBESTOS ___% PCBs ___% METALS ___% SOLVENTS ___% OIL ___% OTHER							
17. DISPOSITION PERFORMED BY (Contractors only) q PSNS q Contractor-arranged (enter proposed transporter & disposition facility) TRANSPORTER COMPANY (name & phone number) _____ DISPOSITION FACILITY (name & phone number) _____							
18. AUTHORIZED SIGNATURE (sign) _____ (print) _____				BADGE NO./RANK		DATE	
<b>SECTION II - CONTAINER INFORMATION</b> (Originators Complete barcode & cont type columns ONLY)							
ITEM NO.	BARCODE	CONT TYPE & CAPACITY	WEIGHT (LBS)	OPEN & INSPECT (initials)	START DATE	STORAGE SECTION	ANALYSIS NO.
1							
2							
3							
4							
5							
<b>SECTION III - 90HM RECEIPT/INVENTORY</b>							
19. INSPECTION SAT? (Circle one) YES NO (explain in "REMARKS")				19a INSPECTOR'S INIT		20. DELIVER TO:	
22. TRANSPORTED BY (Signature & Date)				22. RECEIVED BY (Signature & Date)			
<b>SECTION IV - WASTE DISPOSITION BY 90HM</b>							
25. WSN ASSIGNED				26. DATE			
		27. TECH'S INIT		28. PROFILE			
29. LABELS/PPE				30. DISPOSITION: q Reutilize q Recycle q Trash q HW, PCB q Asbestos q Other _____ q Landfill Controlled - WDA # _____			
31. REMARKS							
						<b>Page 1 of</b>	
PSNS 4855/612 (I(Rev. 4-00) Routing: White: 90HM Pink: Data Entry Blue: Handlers Yellow: Originator							

# WASTE INFORMATION SHEET (WIS)

PSNS 4855/612 (Rev. 4-00) (Back)

## FOR ILLUSTRATION PURPOSES ONLY - DO NOT REPRODUCE

### Waste Information Sheet (WIS) Instructions

**GENERAL:** THIS PAGE PROVIDES BLOCK BY BLOCK INSTRUCTIONS FOR THE ORIGINATOR. NOTE THE FOLLOWING:

- Originators are to complete all sections which are shaded in gray. Enter "N/A" if a block is not applicable.
- A Job Order Number **must** be provided on **all** WISs turned into Shop 90HM. A section is provided in the upper right hand corner of the form for the Job Order Number. WISs **will not** be accepted without a Job Order Number.
- Please write legibly and press hard enough to clearly imprint on all copies.

#### SECTION I

- 1. ORIGINATOR** - This is the organization which is directly creating the waste material. Examples: "C/350"; "S/72"; "ACME Painting".
- 2. PROJECT/SHIP** - Enter the general project or job that is creating the waste. Examples might include: "CVN-72"; "BEQ construction"; "Farragut Ave repair"; "S/71" (used in the case of general Shop work).
- 3. LOCATION** - Record the location where the process occurred which created the waste. Be as specific as possible. Examples include: "Sump room - Bldg. 427"; "south end DD3"; "corner of Huey and Duey St."
- 4. POINT OF CONTACT** - Write the name of the person who is sufficiently knowledgeable to answer questions concerning the waste generation process. This person may be military, civilian, or contractor.
  - 4a. GOV'T POC (Contractors only)** - THIS BLOCK IS FOR CONTRACTORS ONLY! List a government point of contact. This is the government person who is the contracting officer's representative.
- 5. PHONE** - List the phone number for the primary point of contact listed in **block 4**. If this is not a Shipyard phone number, include the area code.
- 6. DESCRIPTION OF WASTE** - This block should be the same as, or very similar to, the "MATERIAL CONTENTS" section of the ID label located on the waste container.
- 7. QUANTITY TO SHIP NOW** - List the actual amount of material to be shipped now. The quantity should be described in terms of the smallest container contained in the transport package. For example a 5-gallon drum full of tubes might say "63 - 25 oz tubes" where as a 55-gallon drum full of liquid would simply say "1- 55 gal drum".
  - 7a. TOTAL TO BE SHIPPED** - This info is used by 90HM for planning purposes. If you are doing a defined project where waste will be shipped to 90HM at various times, ESTIMATE the total quantity of waste to be generated over the life of the project. If this number is unknown or if the project is a very long term or perpetual project, mark this area "N/A".
- 8. WASTE STREAM NUMBER** - If the waste has an established waste stream number, indicate the number here. If the waste is a new waste stream or if you are not sure, indicate "Unknown" here.
- 9. PHYSICAL STATE** - Describe the waste from a standpoint of what you would see, smell, and/or feel if you were to open the waste and look at it. Examples might include "Thick brown sludge" or "clear oily liquid w/ banana scent" or "white paste in tubes".
- 10. HOW THE WASTE WAS MADE** - Describe the process which created the waste. Be as specific as space allows. Examples might include "mild steel water jet cutting" or "removal of dirt, Phys Fitness Center" or "Wiping grease from arresting gear cables" or "excess from pattern gluing". **The words "excess" and "expired" are not processes.** Use these words in conjunction with the process for which they were intended.
- 11. WORK DOCUMENT** - Indicate the document which governs the work process generating the waste. This might be a contract, an IPI, a MILSPEC, an ASTM, an instruction, or any other type of document.
- 12. MSDS** - List the Material Safety Data Sheet number or numbers for hazardous materials which make up the waste.
- 13. STOCK NO.** - List the stock number or stock numbers of the material(s) obtained through the Federal Supply System which make up the waste. If possible include the FSN and the NIIN.
- 14. MANUFACTURER** - Indicate the manufacturer of the material which makes up the waste.
- 15. COLOR OF WASTE** - Indicate the color of the waste. Examples: "milky white"; "black"; "grayish".
- 16. POTENTIAL CONTAMINANTS** - Indicate potential contaminants which you believe MAY be in the waste.
- 17. DISPOSITION PERFORMED BY** - This section is for contractors ONLY. Check "PSNS" if your contract states to turn your waste over to the Shipyard for disposal. Check "Contractor-arranged" if you will be disposing of the waste using non-government resources. If "Contractor-arranged" is checked, indicate the name and phone number of the planned transporter and disposition facility.
- 18. AUTHORIZED SIGNATURE** - This is the person who is authorized by the originator's command or company to request and sign for HW commitments.

#### SECTION II

**"BARCODE" column** - Enter the BARCODE of each container of waste. PLEASE WRITE CLEARLY. If you have more than 6 containers use a continuation sheet(s) or additional WIS(s).

**"CONT TYPE & CAPACITY" column** - Enter the type and capacity of each container being shipped. The following codes can be used to abbreviate some container types.

CODE	TYPE	CODE	TYPE	CODE	TYPE
CY	Cylinder	DF	Fiber drum or poly drum	DT	Dump Truck
CF	Fiber box or carton	DM	Metal drum	TP	Portable Tank

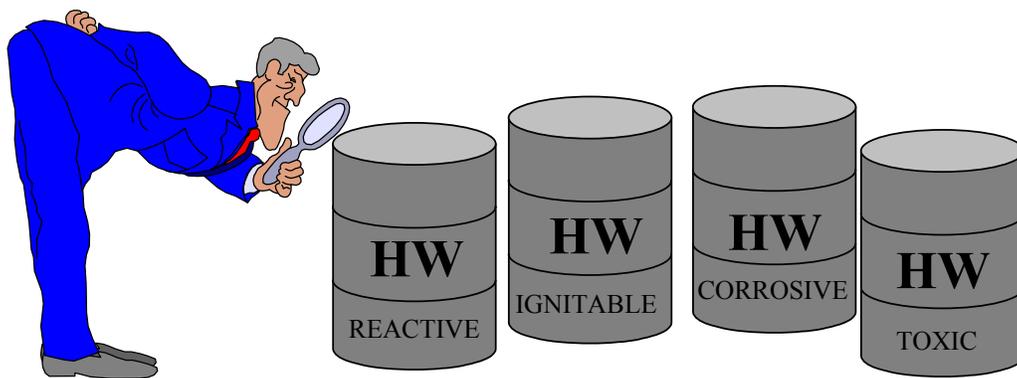
EXAMPLE - "55g DM" is a 55 gallon metal drum, 5g Can is a 5 gallon can.

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## WHY IS HAZARDOUS WASTE COMPLIANCE SO IMPORTANT?

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**“Hazardous Waste Compliance”** means conformance to the many regulations and BNC requirements.

**Hazardous Waste Compliance** may be costly, but it’s a responsibility you must plan for and accept as a cost of doing business at Naval facilities, such as PSNS & IMF and Naval Station Bremerton, or any of their tenants. You can be assured, **non-compliance will be very costly**, and will not be tolerated by the BNC or the regulators. Prime and sub-contractors have been cited, and can be fined, by Washington Department of Ecology for violations of dangerous waste regulations.

While your project may extend across several individual aspects of the BNC and Navy mission, there is one area of responsibility that impacts virtually every one of your actions and operations: **the environment**. The Secretary of the Navy’s policy emphasized that *“the Navy is fully committed to strict compliance with all applicable requirements.”* In order for you to comply, you must have a solid understanding of the BNC’s Hazardous Waste Program, as well as Federal and Washington State requirements.

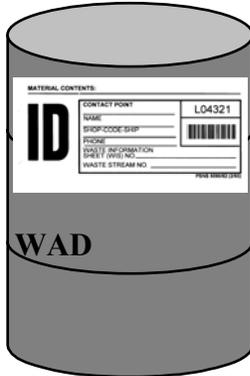
Proper coordination and operations at the BNC are not only needed for compliance reasons, they also benefit your project by preventing time delays or operational shutdowns, and improve public relations. To this end, you must take a proactive approach to policies, procedures, and operations.

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## HOW DO I MANAGE WASTE AWAITING DESIGNATION?

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Waste that has **not** been designated by the PSNS & IMF, Shop 90HM, must be managed as **“Waste Awaiting Designation.”** The BNC requires *Waste Awaiting Designation (WAD)* to be labeled with an ID label, PSNS 5090/82 (2-93) and be controlled much like hazardous waste. WAD is required to be containerized and managed in a Satellite or 45/90-Day accumulation area prior to the end of the work shift. Submit a WIS to the Contracting Officer for government designation within one day of generating the waste. Once designation of the waste has been completed, additional labels and management will take place as dictated by the designation.

### CONTAINER USE AND MANAGEMENT FOR WAD

Containers must be:

- ◆ In good condition and non-leaking.
- ◆ Compatible with the waste being placed in them.
- ◆ Closed at all times, except when waste is being added.
- ◆ Labeled with an ID label, PSNS 5090/82 (2-93) and include the word “WAD.”
- ◆ Positioned so the ID label is visible for inspection.
- ◆ Physically segregated from containers of designated hazardous waste.



**Quick Tip: Waste Awaiting Designation has much the same controls as hazardous waste.**



**Quick Tip: A waste stream number will not be assigned to WAD until the full Government designation has been completed.**

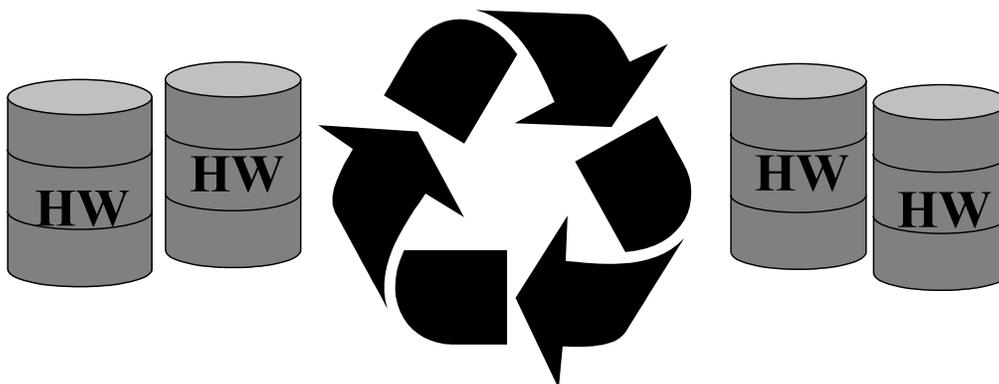
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## CAN I RECYCLE MY HAZARDOUS WASTE?

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Some hazardous waste can be recycled. **Hazardous Waste Minimization** is a Federal requirement and is one of the BNC's top priorities. Recycling is one tool to help minimize waste. The regulations vary on how waste must be managed prior to recycling, depending on the waste itself. The most common categories for recycling are:

- (1) Specifically regulated recyclable materials. These are recyclable materials regulated under their own respective sections of WAC 173-303 (e.g., spent lead-acid batteries).
- (2) Recyclable materials that are not regulated. These are materials that are not reclaimed prior to use, reuse, or returned to the original process.
- (3) Recyclable materials that are fully regulated. These materials are fully regulated up to the point when they actually enter the recycling process that recycles the material.

The majority of waste that is destined for recycling must still be controlled as hazardous waste until the point that it is reclaimed.



**Quick Tip: Do not confuse treatment with reclamation. Treatment is intended to make a waste non-hazardous or less hazardous before final disposal. Reclamation is done for the purpose of recovering and recycling usable materials. Stay clear of "sham recycling," which is treatment or disposal posing as recycling. Washington Department of Ecology has an excellent publication titled "Regulation of Dangerous Wastes Being Recycled," Publication No. 91-46 (Revised Feb 94).**



**Quick Tip: The BNC does not utilize the Universal Waste Regulation, WAC 173-303-573.**

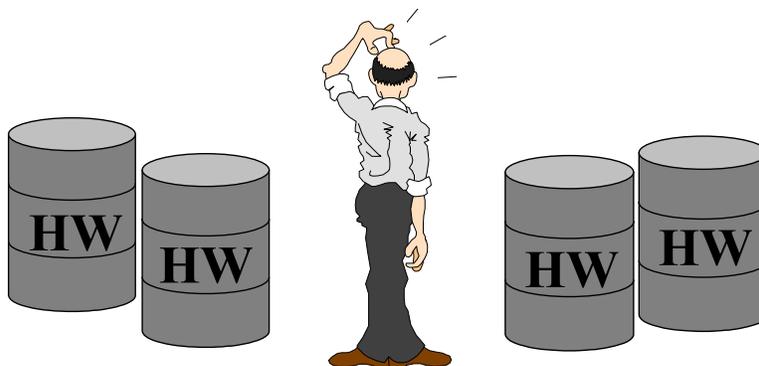
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## WILL I BE HANDLING AND DISPOSING OF THE WASTE PRODUCED FROM MY JOB?

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Responsibilities and BNC specific requirements and procedures for the on-site management and disposal of waste are specified in your contract. This does not relieve the contractor, or its employees, of the responsibility of knowing and following all applicable State and Federal regulations related to hazardous waste. If they are not, have your Contracting Officer contact the base environmental office. If your contract specifies that you will be disposing of your waste, PSNS & IMF Shop 90HM still must designate the waste, approve the profiles, and prepare and sign the **Uniform Hazardous Waste Manifest** for all shipments. Your designated transporter, as well as your Treatment, Storage, and Disposal Facility (TSD) must be selected from the facilities and transporters listed as qualified by the Defense Reutilization and Marketing Service (DRMS). Facilities can be found on the DRMS website at <http://www.drms.dla.mil/environmental/qualfac.pdf> and <http://www.drms.dla.mil/environmental/qualtran.pdf>, respectively.

All personnel must be taught to perform their duties to ensure compliance with WAC 173-303. Personnel must be taught dangerous waste management procedures relevant to their positions and duties and ensure they are able to respond effectively to emergencies referred to as 'general awareness training'. Personnel managing an accumulation area are titled "Accumulation Area Operator (AAO)", and must be trained in accordance with WAC 173-303-330 and attend a two hour facility specific course, provided by PSNS & IMF Code 106.ESH. This training must be completed prior to generation of waste awaiting designation and dangerous waste.

Facility specific procedures must be included in the contractor's written general awareness training plan for all employees and are provided in the contract specifications. This guide and the *Contractors Guide to Environmental Compliance* amplify the station specific requirements and procedures. All contractor personnel responsible for the generation, accumulation, or transportation of hazardous waste must be fully trained on all relevant Washington State, Federal, and BNC specific regulations prior to the generation of waste.



**Quick Tip: The Navy is jointly responsible for all waste generated within its boundaries. You are considered a co-generator of the waste, and as such are liable for your actions. We want you to be successful in this project!**



**Quick Tip: Be prepared with questions at the pre-con or start up meeting and/or the environmental meeting to discuss proper handling and disposal of waste.**



**Quick Tip: Do not rely solely on this guide for all hazardous waste requirements. You must be trained in and understand WAC 173-303.**

# WHAT ARE THE LABELING REQUIREMENTS FOR HAZARDOUS WASTE?



The BNC requires that all known hazardous wastes have an *ID Label*, PSNS 5090/82 (2-93), on the accumulation container(s). All other required labels, such as the *Hazardous Waste Label*, PSNS 5090/81 (Rev. 4-00) or *Washington Dangerous Waste Label*, PSNS 5090/183 (5-00), and any applicable DOT label(s), as well as any additional labels specified in the WIS, must be applied to the containers immediately. The DOT label is used by the BNC to identify the hazard(s) associated with the waste. WSW will be the term used when Washington Dangerous Waste Label is required. Other labels may be required depending on the type of waste and if the BNC will be disposing of it. A labeling flowchart on the next page helps clarify these requirements. The completed WIS will specify all required labels. The Government will supply all the labels for you . . . just ask!



**Quick Tip:** The WIS (section IV, block 29) will specify all the required labels for your waste... including any labeling requirements for non-hazardous waste.

MATERIAL CONTENTS:

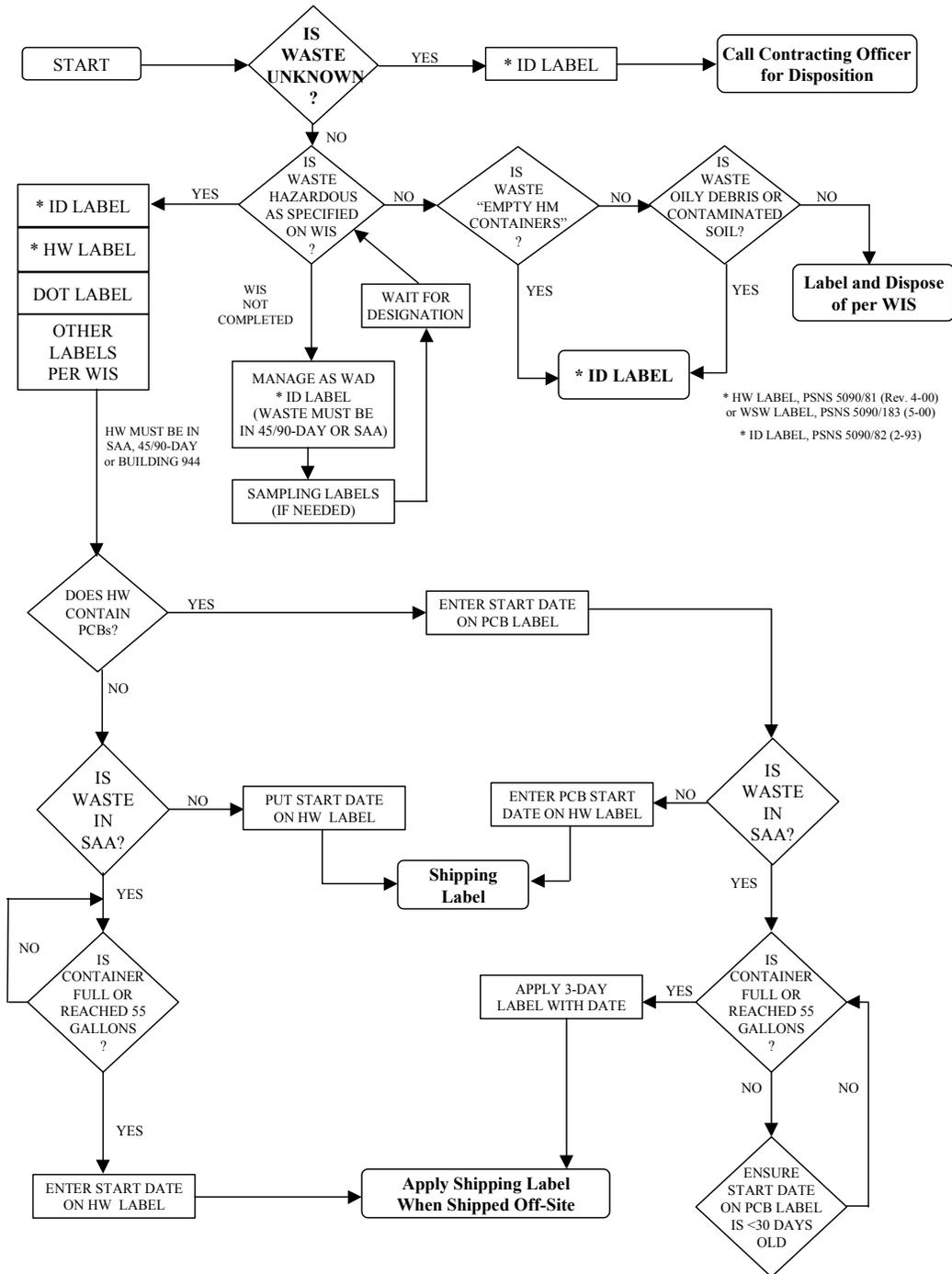
ID	CONTACT POINT	L04321
	NAME	
	SHOP-CODE-SHIP	
	PHONE	
	WASTE INFORMATION SHEET (WIS) NO	
	WASTE STREAM NO	
		PSNS 5090/82 (2/93)



WASHINGTON STATE DANGEROUS WASTE <small>Ref. WA98P01PUGETNET P5000.5</small> STATE LAW PROHIBITS IMPROPER DISPOSAL. IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY AND THE WASHINGTON STATE DEPARTMENT OF ECOLOGY.
NAME PUGET SOUND NAVAL SHIPYARD SHOP 9010M ADDRESS 1400 FARRAGUT AVE. CITY BREMERTON STATE WA ZIP 98314-5001 TELEPHONE (24 HR/DAY) (206) 476-3393 EPA ID NO. WA2170023418 START DATE
HANDLE WITH CARE! <small>PSNS 5090/183 (5/00) USE OF # 0-00</small>

HAZARDOUS WASTE STATE AND FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY AND THE WASHINGTON STATE DEPARTMENT OF ECOLOGY AND THE GENERATOR.
NAME PUGET SOUND NAVAL SHIPYARD C/910C.21 ADDRESS 1400 FARRAGUT AVE. CITY BREMERTON STATE WA ZIP 98314-5001 TELEPHONE (24 HR/DAY) (206) 476-3393 EPA ID NO. WA2170023418 START DATE
HANDLE WITH CARE! <small>PSNS 5090/81 (REV. 4-00) USE OF # 0-00</small>

# HAZARDOUS WASTE LABELING FLOWCHART



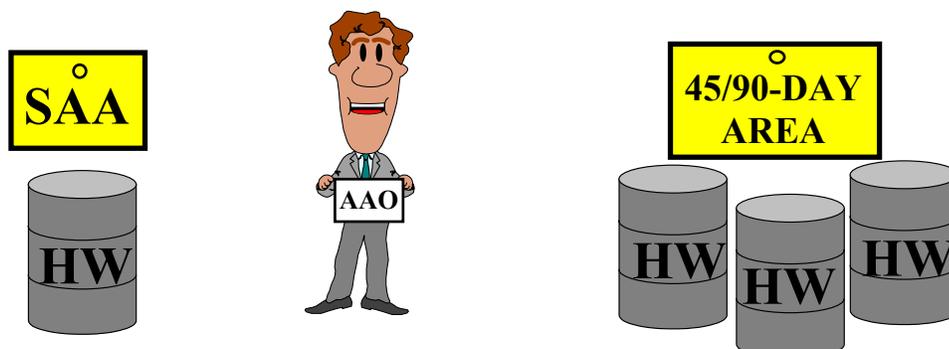
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## HOW DO I ACCUMULATE MY WASTE WHEN I'M THE ACCUMULATION AREA OPERATOR?

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There are two types of accumulation areas:

- ◆ The **Satellite Accumulation Area (SAA)** is an area at or near the point of origination. The waste must be secure, properly containerized, and labeled. There are time and quantity limits with SAAs, which are explained in this guide on page 14 and can also be found in WAC 173-303. The form used by the BNC for registration is provided on page 15.
- ◆ The **45/90-Day Accumulation Areas** have no quantity limits but have substantially more requirements than an SAA. The Dangerous Waste Regulations, WAC 173-303-200 provides state requirements, and your contract specifications provide additional requirements. The form used by the BNC for certification is provided on pages 19 and 20.

Your contract specification will specify if you are responsible for managing an accumulation area. This guide provides the majority of the information needed for accumulation. There are more stringent requirements at the BNC for satellite accumulation than you'll find at other facilities or in the state regulation. Violation of these requirements is the same as violating any other standard regulatory requirement. These additional requirements include the secondary containment, location restrictions, SAA registration, and signs. These are all explained in this guide and your contract specification.



**Quick Tip: The base environmental office can answer your questions on accumulation areas, but be sure to work through your Contracting Officer.**



**Quick Tip: Accumulation areas need to be approved prior to waste generation.**



**Quick Tip: Waste generated onboard large shipboard projects normally will be turned in to a shipboard HazWorld prior to the end of each shift.**



**Quick Tip: Waste generated in dry docks or pierside must NOT be taken onboard ship. All waste generated OFF HULL must be managed OFF HULL-NO EXCEPTIONS,**

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## SATELLITE ACCUMULATION AREA (SAA) REQUIREMENTS

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**Getting Started:** The following information guides you through the basic *Satellite Accumulation Area (SAA)* requirements.

**1. Contact your Contracting Officer** for labels and *Waste Information Sheets, PSNS 4855/612 (Rev. 4-00)*. A sample WIS form is included on pages 3 and 4. Your Contracting Officer can provide assistance on filling out Section 1 of the WIS so your waste stream can be designated. The Government also provides containers if the BNC is disposing of the waste. The Contracting Officer obtains all these items by contacting Shop 90HM.

*The WIS provides information about your waste that you will need to know.*

- ◆ *Labeling*
- ◆ *Description of Waste*
- ◆ *Designation*
- ◆ *Final Disposition*

**2. Contact your Contracting Officer** for a form, *Contractor Request for Hazardous Waste Satellite Accumulation Area Registration, PSNS 5090/136 (Rev. 4-00)*. Submit the registration form when you are ready for your SAA to be registered and prior to generating any waste. Personnel from the base environmental office will come to the worksite within one workday to approve the registration. If any of the information on the registration form changes during the life of the SAA, including closure, the Contracting Officer must be notified and the information forwarded to the base environmental office.

**3. Unknown Waste.** Anyone discovering an unknown waste **must immediately contact their Contracting Officer** for disposition. If you feel there is a threat to human health or the environment, or it constitutes an Emergency Spill Event, then call 911 on a BNC telephone, or 360-476-2222 on a cellular or non-BNC telephone. **Do not store Unknown Waste in an SAA.** The discoverer shall immediately apply an *ID Label, PSNS 5090/82*, and identify the contents as **“UNKNOWN.”** (Do this **only** if you can do so without increased risk to yourself or others.) Your Contracting Officer will work with the base environmental office and Shop 90HM.



**Quick Tip: Keep your Contracting Officer informed on any change of information provided on the registration form. This includes closure.**

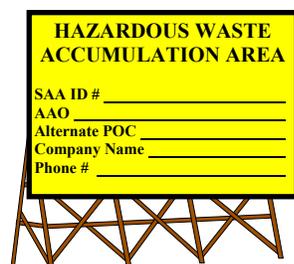
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## SATELLITE ACCUMULATION AREA REQUIREMENTS

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(Continued)



### Setting Up Your SAA:

- 1. Signs.** SAA signs are required for any SAA that is in operation for seven days or more. Contact your Contracting Officer for a Hazardous Waste Accumulation Area sign. Signs are available from the base environmental office. The sign has information blanks in which you identify the SAA ID#, Accumulation Area Operator (AAO), alternate Point of Contact (POC), company name, and phone number. Write this information on the sign with a grease pencil. Post the sign so it is visible from a distance of 25 feet.
- 2. Labels.** All containers of hazardous waste must have the following labels: *ID Label (PSNS 5090/82)*, *HW Label (PSNS 5090/81)* or *WSW Label (PSNS 5090/183)*, *applicable DOT Label*, and any additional labels specified on the WIS. ID labels must be filled in completely. Hazardous waste labels must be clearly visible. All labels are to be applied immediately and should be placed on the upper one-third of the container.
- 3. Location.** Containers of ignitable or reactive hazardous waste must be located 50 feet from the Bremerton Naval Complex fence line, unless waste is locked in a building or is in transit. Consideration must be given for forklift and/or crane access for waste pickup when looking at a potential SAA location. Remember, the first criteria for an SAA is “*at or near*” the point of waste generation. Your Contracting Officer will work with the PSNS & IMF Code 106.33 or NAVSTA Bremerton N45A4 for approval.
- 4. Security.** The AAO is responsible for ensuring that the SAA is secure or under their control to prevent improper mixing or unauthorized addition of waste to the containers. SAAs located outside of buildings must be under the control of the AAO or secured by lock. A drum with a lid secured by a mechanically tightened ring and bolt, or a drum with a wrench-tight bung top, is considered locked and secure. Other methods of securing the area must be approved, in writing, by the Contracting Officer who will work with the base environmental office approval. SAAs on piers or other over-the-water worksites must be attended by the AAO at all times.
- 5. Incompatibles.** Containers of incompatible waste **must** be physically separated (e.g., bermed). If in doubt about compatibility, contact your Contracting Officer who will work with Shop 90HM.
- 6. Flammables/Reactives.** Accumulate flammable, combustible, or reactive waste per local fire code, in addition to the hazardous waste requirements.



**Quick Tip: Planning your SAA can make a difference in the ease of operation.**

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## SATELLITE ACCUMULATION AREA REQUIREMENTS

(Continued)

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### 7. Secondary Containment

a. Secondary containment of **all hazardous waste is required** in SAAs on piers, or at other over-the-water worksites. Criteria for secondary containment is found in WAC 173-303-630(7).

b. Secondary containment is also **required** in SAAs for **all liquid hazardous waste or WAD** in dry docks or within 50 feet of a storm drain. Storm drains within 50 feet of an SAA must be blocked or otherwise protected from spills.

c. **Containers of waste flammable liquids or reactive waste** must have secondary containment **anywhere** they are accumulated or being transferred from one container to another.

8. Start Date/Time and Quantity Limits. When 55 gallons or more of a hazardous waste stream is present in the SAA, the start date must be filled in on the HW or WSW label; and all waste of that particular waste stream, must be transferred to a 45/90-Day Accumulation Area or shipped off-site to a TSDF within three days from the start date.



### Arranging for Waste Pickup (when BNC is Handling Waste)

If you are not responsible to manage an accumulation area then hazardous waste and waste awaiting designation must be turned over to a trained AAO at a Government operated accumulation area **prior to the end of each work shift**. A WIS with Section 1 completed must accompany each waste stream being transported (record this WIS # on the ID label). AAOs must properly palletize their waste and contact their Contracting Officer for pickup of the waste. The Contracting Officer will coordinate with Shop 90HM for pickup or turn-in of waste.

Shop 90HM will pickup waste pierside and in shop areas; however, transfer of the waste from ships or out of the dry docks is the responsibility of the waste originator. For shore based projects, the contract typically requires the contractor to turn in waste to the government. Most turn-ins will be to Building 367 at PSNS & IMF.



**Quick Tip: Hazardous waste may not be left unattended on piers or other over-water sites. Once waste is taken off the ship, it cannot be taken back on board.**



**Quick Tip: Remember to notify your Contracting Officer to close out your SAA when all the waste has been removed.**



**Quick Tip: Remember time limits are calendar days NOT working days.**

# CONTRACTOR REQUEST FOR HAZARDOUS WASTE SATELLITE ACCUMULATION AREA REGISTRATION

PSNS 5090/136 (Rev. 4-00)

**FOR ILLUSTRATION PURPOSES ONLY - DO NOT REPRODUCE**

CONTRACTOR REQUEST FOR HAZARDOUS WASTE SATELLITE ACCUMULATION AREA (SAA) REGISTRATION			
			Ref: NAVSHIPYDPUGETINST P5090.5
<b>THE SUBMITTAL OF THIS FORM REQUESTS CODE 106.3 TO INSPECT A HAZARDOUS WASTE SATELLITE ACCUMULATION AREA (SAA) FOR REGISTRATION OF THE SITE. CODE 106.3 SHALL INSPECT FOR REGISTRATION WITHIN ONE WORKING DAY OF RECEIPT OF THIS FORM.</b>			
COMPANY NAME	CONTRACT NUMBER	SITE SUPERINTENDENT	PHONE NUMBER
SITE LOCATION		ESTIMATED DURATION OF SAA	
WASTE STREAMS			
TRAINED ACCUMULATION AREA OPERATOR (AAO)			PHONE NUMBER
ALTERNATE POINT OF CONTACT			PHONE NUMBER
<b>I VERIFY THAT THE HAZARDOUS WASTE SAA IDENTIFIED ABOVE WAS INSPECTED USING THE SAA PRE-REGISTRATION INSPECTION CRITERIA (BELOW) AND ALL APPLICABLE ATTRIBUTES WERE SATISFACTORY.</b>			
CONTRACTING OFFICER SIGNATURE		PHONE	DATE
<b>NOTE: ANY CHANGES IN THE INFORMATION PROVIDED ON THIS FORM MUST BE FORWARDED TO THE SHIPYARD REPRESENTATIVE VIA THE CONTRACTING OFFICER WITHIN ONE WORK DAY.</b>			
<b>SATELLITE ACCUMULATION AREA PRE-REGISTRATION INSPECTION</b>			
<u>ATTRIBUTES*</u>			<u>YES / NO</u>
1. IS THE AREA SECURE OR UNDER THE CONTROL OF THE AAO? <i>If the area is outdoors, it must be under the control of the AAO or secured by lock. (A drum with a tightened ring and bolt is considered locked.)</i>			_____
2. IS A SPILL KIT READILY AVAILABLE AND ADEQUATE FOR THE TYPES AND AMOUNTS OF WASTE EXPECTED?			_____
3. IS SECONDARY CONTAINMENT SET UP IF:			_____
A. THE AREA IS ON A PIER OR OTHER OVER-WATER WORKSITE?			_____
B. LIQUID HW WILL BE ACCUMULATED IN A DRY DOCK OR WITHIN 50 FEET OF A STORM DRAIN?			_____
C. CONTAINERS OF FLAMMABLE LIQUID OR REACTIVE WASTES WILL BE ACCUMULATED?			_____
4. ARE STORM DRAINS WITHIN 50 FEET OF THE AREA BLOCKED OR OTHERWISE PROTECTED FROM SPILLS?			_____
5. IF IGNITABLE OR REACTIVE WASTE IS TO BE ACCUMULATED, IS THE AREA LOCATED AT LEAST 50 FEET FROM THE PROPERTY BOUNDARY? <i>(unless waste is in a building)</i>			_____
6. IF FLAMMABLE, COMBUSTIBLE, OR REACTIVE WASTES WILL BE ACCUMULATED, DOES THE AREA MEET THE REQUIREMENTS OF THE LOCAL FIRE DEPARTMENT?			_____
7. IS A CONTRACTOR WASTE STREAM DICTIONARY, ID LABELS, AND WASTE INFORMATION SHEETS (WIS) AVAILABLE FOR USE AT THE JOB SITE?			_____
*If an attribute is not applicable, mark "NA" in the Yes/No column.			
SHIPYARD REPRESENTATIVE (CODE 106.3)		PHONE	DATE/TIME
ASSIGNED SAA NUMBER		DATE SAA CLOSED	
PSNS 5090/136 (Rev. 4-00)			

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## 45/90-DAY ACCUMULATION AREA REQUIREMENTS

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The following information guides you through the major requirements for a **45/90-Day Accumulation Area**. Unlike SAAs, there is no limit on how much hazardous waste can be held. As the name implies, waste can be held for up to 90 days from the start date; however, your contract will specify to start arrangements for turn-in or off-site shipping within 45 days of the start date. This reduced time frame is necessary to ensure all waste is shipped off-site to a TSDF within 90 days of the start date. The “45” part of the 45/90-day is to flag you of the need to initiate transport and disposal actions. If hazardous waste is not shipped to off-site within 90 days, the shipyard and contractor could be subject to a citation and fine and/or the much more stringent permitting requirements of a TSDF.



### Getting Started:

**1. Contact your Contracting Officer to obtain a form, *Contractor Request for 90-Day Hazardous Waste Accumulation Area Certification, PSNS 5090/137 (Rev. 4-00)*.** This form provides a list of items that are required for an approved area. Make sure all attributes are addressed and then submit the form to the Contracting Officer. The Contracting Officer will check your area and sign that it is ready for inspection. A representative from the base environmental office and the Fire Department will inspect your area and certify it for use **if** all the requirements have been met.

**2. The following is a quick list of major requirements for which you are responsible:**

- ◆ The area cannot be located on piers or in dry docks.
- ◆ Wastes must be transported off-site to an approved TSDF within 90 days of the accumulation start date. Initiate transport action within 45 days of the start date.
- ◆ The area will be used only for the storage of waste and waste awaiting designation. It will not be used to store non-related materials, equipment, or be used for other functions.
- ◆ Container use and management requirements specified in WAC 173-303-200, -630, and your contract specifications (including the environmental plan) must be followed.
- ◆ The *Puget Sound Naval Shipyard and Naval Station Bremerton Emergency Spill Response Procedures, PSNS 5090/9*, form will be posted and a spill kit will be maintained in this area.
- ◆ A fire extinguisher, two-way communication device, and alarm must be present.
- ◆ Emergency shower/eyewash stations will be immediately available, tested weekly, and functioning.
- ◆ The gate/door to the accumulation area will remain locked when the trained AAO is not present.
- ◆ Secondary containment will be provided at the accumulation area for all hazardous waste.

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## 45/90-DAY ACCUMULATION AREA REQUIREMENTS

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(Continued)



- ◆ Signs reading “**HAZARDOUS WASTE ACCUMULATION AREA**” and “**DANGER - UNAUTHORIZED PERSONNEL KEEP OUT**” will be posted at the entrance to the accumulation area and must be legible from a distance of 25 feet or more.
- ◆ “**NO SMOKING OR OPEN FLAME**” signs will be posted on all four sides of the fence and will be legible from 50 feet.
- ◆ Inspections of the accumulation area will be conducted every **seven calendar days** by the AAO. The AAO must maintain a logbook of the inspections. The date, time, findings, actions taken, and signature of the inspector will be included. A form, PSNS 5090/127, will be completed to meet this requirement. The completed form will be submitted to the Contracting Officer and forwarded to the base environmental office at the end of each month (within five days).
- ◆ Prior to closure of the accumulation area, all containers, liners, bases (e.g., concrete slab or paving), and soil (as applicable) must be decontaminated or removed. The Contracting Officer shall be notified within three working days of closure, so that a close-out inspection may be arranged with the base environmental office.

### 3. Container Management

Containers of hazardous waste must be closed at all times, except when waste is being added or removed. Containers with liquids will be closed and secured with ring and bolt, or bung screwed in (wrench tight). Containers with solids will have snug fitting lids. If you have waste that is subject to 40 CFR, Part 265, Subpart CC requirements (volatile organic compounds), then the container must be closed in accordance with the Subpart CC requirements.

Only reuse containers for the same waste stream, unless they are uncontaminated-overpack containers.

Position containers so that the labels are clearly visible. Place the labels on the top one-third of the drum, whenever possible. When using roll-off boxes, place labels on the front of the container.

Maintain a 36-inch aisle space between each row of containers. This is required so that containers can be readily inspected and personnel have access to them.

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## **45/90-DAY ACCUMULATION AREA REQUIREMENTS**

(Continued)

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### **4. Inventory and Tracking**

An inventory, tracking the coming and going of all containers, is required to be on-site and current. The inventory includes:

- ◆ Originator's Name
- ◆ Waste Description
- ◆ Type and Quantity of Waste Containers
- ◆ Accumulation Start Date
- ◆ Date Received at Accumulation Area
- ◆ Date Shipped from Accumulation Area
- ◆ Waste Stream Number

Copies of the inventory records are to be submitted to the Contracting Officer for forwarding to the Fire Department, Code N3211, by the first of each month.

### **5. Government Shipping The Waste Off-Site**

If your contract specifies that the Government will dispose of the dangerous waste, make arrangements within 45 calendar days of the start date with your Contracting Officer for coordination with Shop 90HM to ship bulk containers of waste. Non-bulk containers (e.g., 55-gallon drums) need to be turned in to the Government 45 days from the start date. Depending on the quantity of the waste, the BNC may want to ship the waste directly off-site from your area, or transfer it to the BNC's 90-Day Facility. Shop 90HM needs about 45 days if the waste is going to be shipped directly off-site.

### **6. Contractor Shipping the Waste Off-Site**

If your contract specifies for you to provide the transporter and the TSDF, then at least 20 working days before requesting a manifest, submit copies of the profile(s) for Government approval. The Government encourages submitting profiles as soon as the waste is first designated. Then at least 10 days before you want to ship, contact your Contracting Officer to coordinate with Shop 90HM for manifest and Land Disposal Restriction (LDR) preparation. The profile should already be approved. Shop 90HM will prepare the manifest and the LDRs. On the date of shipping, personnel from Shop 90HM will verify the waste and weight, and sign the manifest. Shop 90HM keeps one copy after the transporter signs in his block and the rest of the documents go with the transporter.

When the waste reaches the TSDF, the receiving facility will sign in their block and send the original back to the BNC. The BNC needs to receive the manifest within 35 days of the ship date or, by regulation we have to call and obtain the status of our waste. If we don't receive the manifest within 45 days of the ship date, then we have to submit an exception report to Washington Department of Ecology.

Within 10 working days after the final disposal, you are required to submit the Certificate of Final Disposal (CFD). Final disposal means disposal of all wastes and any residues from the treatment of waste prior to disposal. Review your contract specification for all the information included in a CFD.

# CONTRACTOR REQUEST FOR 45/90-DAY HAZARDOUS WASTE ACCUMULATION AREA CERTIFICATION

PSNS 5090/137 (Rev. 4-00) (Front)

***FOR ILLUSTRATION PURPOSES ONLY - DO NOT REPRODUCE***

<b>CONTRACTOR REQUEST FOR 45/90-DAY HAZARDOUS WASTE ACCUMULATION AREA CERTIFICATION / RE-CERTIFICATION</b>	
<small>Ref: NAVSHIPYDPUGETINST P5090.5</small>	
<p style="text-align: center;">THE SUBMITTAL OF THIS FORM REQUESTS CODE 106.3 TO INSPECT A 45/90-DAY HAZARDOUS WASTE ACCUMULATION AREA FOR CERTIFICATION / RE-CERTIFICATION OF OPERATION. CODE 106.3 SHALL INSPECT FOR CERTIFICATION WITHIN ONE WORKING DAY OF RECEIPT OF THIS FORM.</p>	
CONTRACTOR	
SITE LOCATION	
ACCUMULATION AREA OPERATOR	PHONE NUMBER
SITE SUPERINTENDENT	PHONE NUMBER
<p style="text-align: center;">I VERIFY THAT THE 45/90-DAY HAZARDOUS WASTE ACCUMULATION AREA IDENTIFIED ABOVE WAS INSPECTED USING THE PRE-CERTIFICATION INSPECTION CRITERIA AND ALL APPLICABLE ATTRIBUTES WERE SATISFACTORY.</p>	
CONTRACTING OFFICER SIGNATURE	DATE
REMARKS	
<small>PSNS 5090/137 (Rev. 4-00) (Front)</small>	

# CONTRACTOR REQUEST FOR 45/90-DAY HAZARDOUS WASTE ACCUMULATION AREA CERTIFICATION

**PSNS 5090/137 (Rev. 4-00) (Back)**

***FOR ILLUSTRATION PURPOSES ONLY - DO NOT REPRODUCE***

<b>CONTRACTOR REQUEST FOR 45/90-DAY HAZARDOUS WASTE ACCUMULATION AREA CERTIFICATION / RE-CERTIFICATION</b>			
<b>PRE-CERTIFICATION INSPECTION</b>			
<b>LOCATION OF 45/90-DAY SITE:</b>			
<b>CONTRACTOR REQUESTING CERTIFICATION:</b>			
<b>ATTRIBUTES*</b>	<b>INITIALS</b>		
1. LOCKABLE WHEN AUTHORIZED PERSONNEL ARE NOT PRESENT.	_____		
2. SIGNS:	_____		
A. "HWAA & DANGER UA PERSONNEL KEEP OUT" POSTED ON ENTRANCE & LEGIBLE 25 FEET AWAY.	_____		
B. "NO SMOKING / OPEN FLAME" POSTED ON ALL SIDES AND LEGIBLE 50 FEET AWAY.	_____		
C. "NO HOT WORK" POSTED ON ALL SIDES (IN PRODUCTION AREAS ONLY).	_____		
3. SPILL KIT ON SITE.	_____		
4. EYEWASH/SHOWER IMMEDIATELY AVAILABLE AND WORKING.	_____		
5. TWO-WAY EMERGENCY COMMUNICATION DEVICE AVAILABLE AND OPERABLE.	_____		
6. APPROVED SECONDARY CONTAINMENT.	_____		
7. INVENTORY RECORDS ON SITE.	_____		
8. INSPECTION LOG SHEETS ON SITE.	_____		
9. PERSONNEL MANAGING HWAA HAVE CURRENT DOCUMENTED TRAINING.	_____		
10. EMERGENCY SPILL RESPONSE PROCEDURES POSTED (PSNS 5090/9).	_____		
11. FIRE EXTINGUISHERS PRESENT AND CURRENTLY INSPECTED (MONTHLY).	_____		
12. METHOD TO PROVIDE ALARM FOR EMERGENCIES.	_____		
13. LOCATED >50 FEET FROM BREMERTON NAVAL COMPLEX FENCE LINE, UNLESS IN A BUILDING.	_____		
14. NOT LOCATED ON A PIER OR IN A DRY DOCK.	_____		
15. SUFFICIENT AISLE SPACE (MINIMUM 36 INCHES) IS MAINTAINED.	_____		
16. INVENTORY RECORDS FORWARDED TO CONTRACTING OFFICER MONTHLY	_____		
17. INSPECTION LOGS FORWARDED TO CONTRACTING OFFICER MONTHLY	_____		
18. WASTE "AWAITING DESIGNATION" IS SEGREGATED FROM DESIGNATED HW.	_____		
19. ID LABELS ON CONTAINERS ARE PROPERLY FILLED OUT.	_____		
20. A WIS IS COMPLETED FOR EACH TYPE OF WASTE BEING DISPOSED.	_____		
21. FLAMMABLE, COMBUSTIBLE, OR REACTIVE WASTE STORED PER THE LOCAL FIRE CODE.	_____		
22. CONTAINERS ARE IN GOOD CONDITION AND HAVE PROPER FITTING LIDS.	_____		
23. CONTAINERS CLOSED EXCEPT WHEN ADDING OR REMOVING WASTE.	_____		
24. HW LABELS VISIBLE AND START DATE FILLED IN.	_____		
25. INCOMPATIBLE HW SEPARATED BY DIKE, BERM, WALL, OR OTHER DEVICE.	_____		
26. CERTIFICATION FORM POSTED.	_____		
* INITIAL CERTIFICATION INCLUDES ATTRIBUTES 1-14 ONLY.			
<b>INSPECTOR'S SIGNATURE</b>	<b>PHONE</b>	<b>DATE</b>	<b>TIME</b>
<b>PSNS 5090/137 (Rev. 4-00) (Back)</b>			

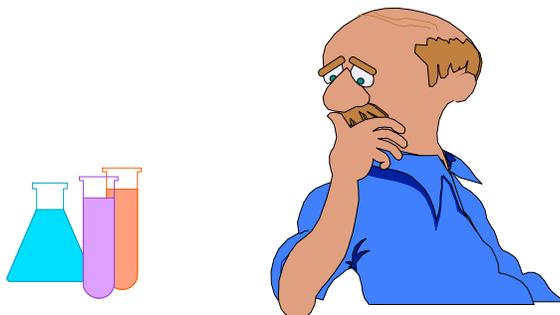
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## HOW AND WHO WILL BE DOING MY SAMPLE ANALYSIS FOR THE WASTE DESIGNATION?

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If **you** are responsible for disposing of your waste, then typically the contract also specifies that you are responsible for sampling and analysis of the waste. Before submitting samples to be analyzed, confer with your Contracting Officer to verify the analysis required to ensure proper designation of the waste. The Contracting Officer will work with Shop 90HM to determine the required analysis (tests) for waste designation. When metals are a concern, analysis will include the eight RCRA metals, plus copper, nickel, and zinc. The contractor must prepare and submit for Government approval a Sampling and Analysis Plan, prior to collecting samples.

Sampling of waste is to be accomplished using the procedures in Environmental Protection Agency (EPA) Publication, *Samplers and Sampling Procedures for Hazardous Waste Streams*, EPA 600/2. Waste analysis is to be accomplished by using EPA Publication, *Test Methods for Evaluation Solid Waste - Physical/Chemical Methods*, SW-846. Washington Department of Ecology also has a publication which adopts the EPA Publication, *Chemical Testing Methods for Designating Dangerous Waste*, #97-407.

If the Government is responsible for waste disposal, the sampling and analysis will be accomplished by the BNC, unless otherwise specified in the contract.

If analytical results are available before the job starts, include it with your WIS.

A list of environmental laboratories accredited by the Washington Department of Ecology is available at their website at <http://www.ecy.wa.gov/programs/eap/labs/lablist.html>.



**Quick Tip: Shop 90HM provides information on what analysis is required for waste designation. The Government must review and approve your Sampling and Analysis Plan, prior to collecting samples.**



**Quick Tip: PSNS & IMF, Shop 90HM will ALWAYS designate your waste.**



**Quick Tip: Waste being sampled for designation must be managed as WAD.**

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## WHO'S RESPONSIBLE FOR WHAT?

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**You, the Contractor,** are responsible to comply with your contract specifications (including your approved Environmental Plan and Hazardous Waste Management Plan), in addition to complying and being trained in all the Federal, State, and local regulations.

**Your Contracting Officer** is responsible to ensure that you are aware of our hazardous waste requirements, to monitor your compliance, and to be a liaison between you and the BNC. They are also responsible to answer any questions you have regarding hazardous waste requirements.

**PSNS & IMF Code 106** is responsible to act as the overall program coordinator for hazardous waste management and provides compliance information and technical assistance for PSNS & IMF. They do all the reporting to regulatory agencies and interpret laws and regulations. They are the registration point for accumulation areas and will initially inspect and approve accumulation areas.

**NAVSTA Bremerton, Code N45A4,** provides compliance information and technical assistance for Naval Station Bremerton. They are the registration point for accumulation areas and will initially inspect and approve accumulation areas.

**PSNS & IMF Code 134** analyzes samples when the BNC is responsible for waste disposal. They perform quality assurance checks for outside analysis.

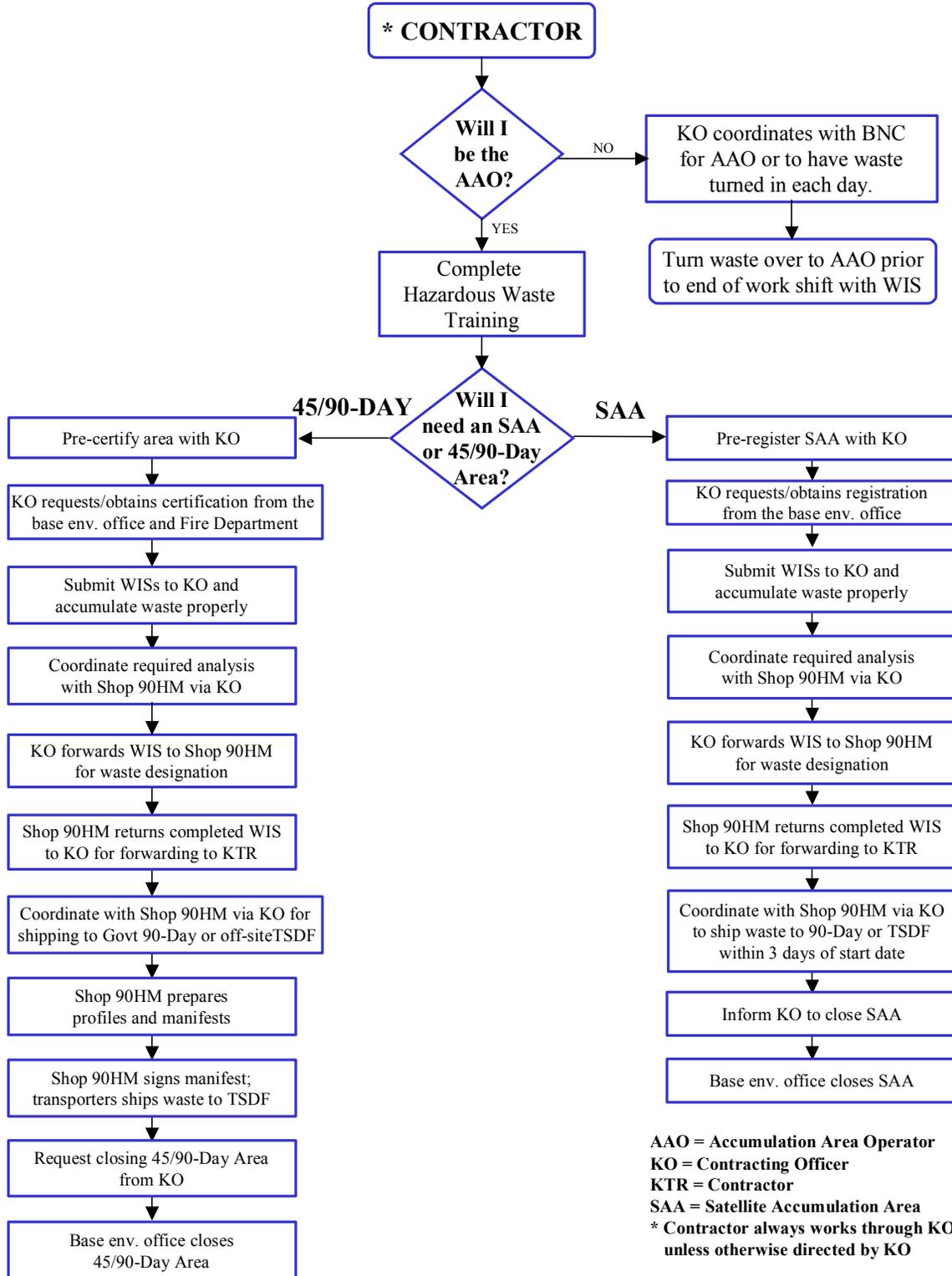
**PSNS & IMF Shop 90HM** determines proper designation, classification, and disposition of all waste. They collect samples when the BNC is responsible for disposal, unless otherwise specified in the contract. They provide information on labeling and marking. They provide all required labels. Depending on the contract specifications, they may supply containers, be the Accumulation Area Operator, and arrange for the off-site transport and disposal of hazardous waste.

**Code N3211, Fire Department,** inspects all work areas to ensure the safe storage of chemicals in an effort to reduce fire hazards. The Fire Department jointly inspects and approves 45/90-Day Accumulation Areas with the base environmental office.

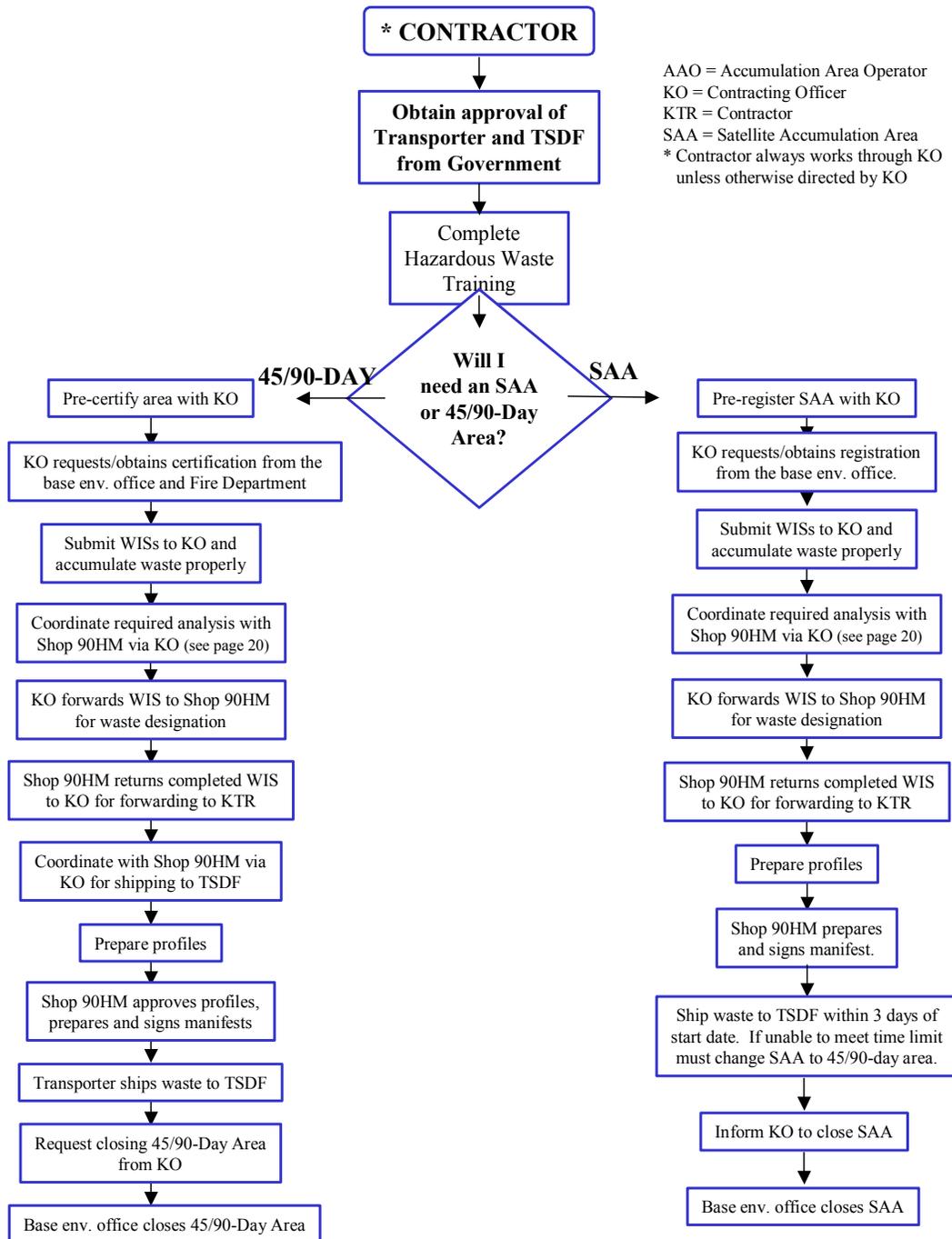
On the following pages you will find two flowcharts. The first is an overview of the path that will be taken when the BNC is disposing of the waste. The second is the path taken if you are disposing of the waste.

*Bremerton naval complex*

## BNC DISPOSING OF CONTRACTOR WASTE FLOWCHART



# CONTRACTOR DISPOSING OF WASTE FLOWCHART



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## THE ROAD TO COMPLIANCE

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In conclusion, the road to compliance depends on everyone knowing their responsibilities and proper procedures for managing waste. We all have responsibilities to help ensure compliance with all the regulations. This guide, in addition to the *Contractor's Guide to Environmental Compliance*, are valuable tools to help you in meeting your responsibilities for hazardous waste compliance.

***We wish you environmental success on this project and in the future!!!***

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# TELEPHONE LISTING

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## EMERGENCIES (Medical Assistance, Fire, Flooding, Emergency Spill Response, etc.):

When using a BNC telephone ..... 911  
 When using a non-BNC telephone system ..... 360-476-2222

## CONTRACTING OFFICES

EFA-NW Bremerton ROICC, Building 467 ..... 360-476-8130  
 or 360-476-4552  
 EFA-NW Silverdale Field Office ..... 360-396-6844  
 Supervisor of Shipbuilding (SUPSHIP) ..... 360-476-4326  
 Fleet and Industrial Supply Center (FISC) ..... 360-476-4289  
 NAVSTA Bremerton, Contract Oversight (QAE).....360-476-7947

## BNC ENVIRONMENTAL MANAGERS (For Emergency Use Only):

<u>PROGRAM</u>	<u>PSNS &amp; IMF</u>	<u>NAVSTA BREMERTON</u>
Air (Permits/Discharges/ODS)*	360-476-0124	
Asbestos	360-476-4699	360-476-4744
Contracts Support	360-476-0136	360-476-6691
Hazardous Material*	360-476-4364	
Hazardous Waste (HW)	360-476-5734	360-476-6067
Historical/Natural Resources	360-476-4049	360-476-6691
Installation Restoration	360-476-2630	360-476-6082
PCBs	360-476-0127	360-476-6067
Solid Waste*		360-476-6083
Spill Prevention and Response*	360-476-1842	
Water Quality and Stormwater/Sewer Discharge	360-476-0118	360-476-6614

*\*Program is managed for all of the BNC by the activity whose phone number is listed.*

## BNC ENVIRONMENTAL SERVICES (For Emergency Use Only):

Waste Designation\*\* .....360-476-8607  
 HW/PCB (Containers/Labels/Turn-In (B-367)\*\* ..... 360-476-7777

*\*\*Services provided for all of the BNC.*